



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

AUG 31 2009

Colonel David C. Weston
District Engineer, Galveston District
Department of the Army, Corps of Engineers
P.O. Box 1229
Galveston, TX 77553-1229

Re: San Jacinto River Waste Pits Superfund Site, Harris County, Texas

Dear Colonel Weston:

This letter represents a formal notification by the U.S. Environmental Protection Agency (EPA) on two recent events that have occurred related to the San Jacinto River Waste Pits Superfund Site (Site).

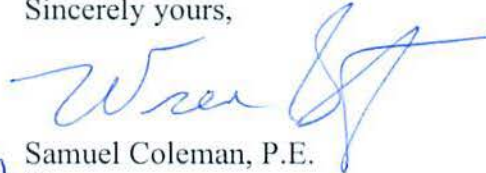
First, on July 17, 2009, the EPA issued Special Notice Letters to potentially responsible parties (PRPs) inviting them to formally negotiate an Administrative Order on Consent to conduct a Remedial Investigation (RI) and Feasibility Study (FS) at the site. This event marks the beginning of several steps that the EPA will be taking with the PRPs thru the Superfund process (Enclosure 1).

Second, due to the unique location of the Site, the EPA, in coordination with the U.S. Army Corps of Engineers (USACE) and the Texas Commission on Environmental Quality (TCEQ), has identified a boundary where potential dredging and/or construction activities may impact the RI and FS that is currently being negotiated, as well as, the future cleanup of the Site (Enclosures 2 and 3).

Currently, the EPA project team is working to address the first event, while an inter-agency workgroup has been formed, between EPA, USACE, and TCEQ, to address the second event. As you can see, there may be liability and technical issues due to the current EPA enforcement actions, the location of the Site, and the steps that need to be taken as we proceed with the Superfund process. It is the goal of both the EPA project team and inter-agency workgroup to resolve any issues related to these two events.

I look forward to updating you again as progress continues on these two events. If there are any questions regarding this matter, please feel free to contact Mr. Carlos Sanchez at (214) 665-8507 or Mr. Stephen Tzhone of my staff at (214) 665-8409.

Sincerely yours,



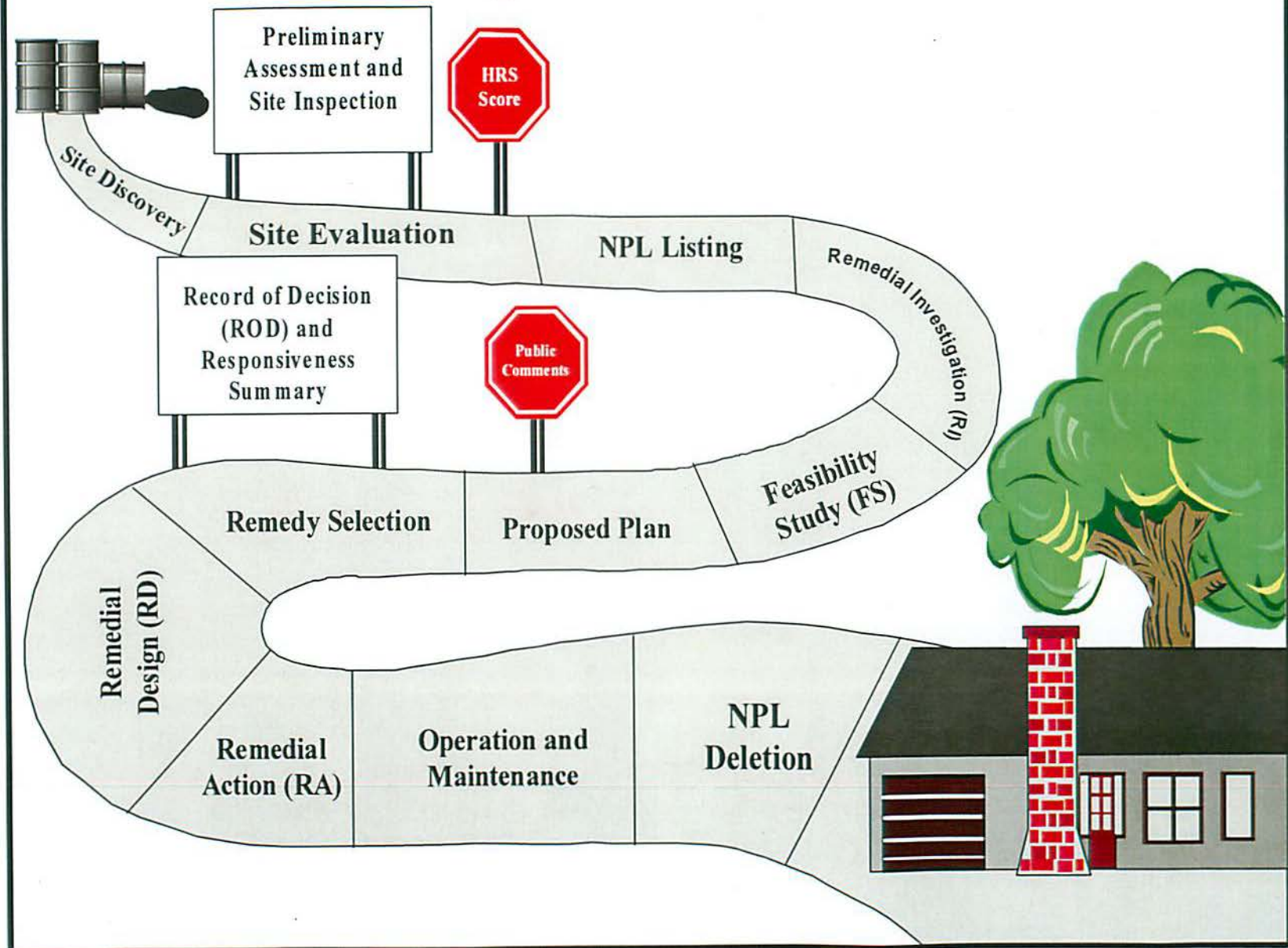
for Samuel Coleman, P.E.
Director
Superfund Division

Cc: Mark R. Vickery, P.G.
Texas Commission on Environmental Quality

Enclosures (3)

- 1: The Superfund Process roadmap
- 2: USACE letter to EPA (June 2, 2009)
- 3: EPA/USACE/TCEQ meeting minutes (July 15, 2009)

The Superfund Process





REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
GALVESTON DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1229
GALVESTON TX 77553-1229

JUN 02 2009

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EPA REGION VI

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SUPERFUND DIV.
REVITALIZATION & RESOURCES
ENR 101 16SF-VI

Policy Analysis Section

SUBJECT: San Jacinto River Waste Pits Superfund National Priority List Site

David A. Parrish
Information Management Team
Superfund Division (6SF-VI)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Dear Mr. Parrish:

This is in response to your May 13, 2009, letter, in which you requested a list of U.S. Army Corps of Engineers (USACE) permit actions in the vicinity of the San Jacinto River Waste Pits Superfund National Priority List Site. The area of interest was identified in a geographic information system (GIS) shape file you provided to us by email on April 23, 2009.

I am enclosing a map showing the area of interest along with the location of all USACE Regulatory actions which were identified in our Regulatory database. Also enclosed is a list of these actions sorted by permit number with respective permit name, description, and latitude longitude coordinates. Accordingly, we will be happy to provide you with a GIS shape file which includes this information.

We look forward to working with your office in your effort to investigate and resolve this matter. I will be happy to meet and discuss what additional information may be made available. Please contact me at 409-766-3947, if you have any questions, or would like to discuss in more detail.

Sincerely,

Casey Cutler
Chief, Policy Analysis Section

Enclosure

(Copies Furnished - See Page 2)

Copies Furnished:

Stephen Tzhone
Remedial Project Manager
EPA - Region 6 [6SF-RA]
1445 Ross Avenue
Dallas, Texas 75202

Sharon Parrish
EPA - Region 6
1445 Ross Avenue
Dallas, Texas 75202

Mark Fisher
Texas Commission on Environmental Quality
Water Quality Standards Team
P.O. Box 13087, MC-150
Austin, Texas 78711-3087



Permit Number	Permit Name	Long	Lat
SWG-2008-01219	CTCO of Texas LLC-Dredg Barge Fleetg Basin,	-95.084460	29.787267
SWG-2008-01214	Bludworth Marine LLC-Bkhead,Drivewy,Dredge,	-95.101964	29.775883
SWG-2008-00726	Pat Boone - Pilings,	-95.100500	29.780600
SWG-2008-00724	Premier Geophysical Services-2D Seismic Surv,	-95.067000	29.799000
SWG-2008-00724	Premier Geophysical Services - 2D Seismic Surv,	-95.099000	29.779000
SWG-2008-00618	Glendale Boat Works, Inc. - Marine Slip,	-95.067184	29.793353
SWG-2008-00556	Robert Pritchett - GP 14392 - L-Head Pier,	-95.060000	29.800000
SWG-2008-00106	Sabine River Authority Maintenance Dredge,	-95.063313	29.831513
SWG-2007-01918	CenterPoint Energy-High Pressure Gas Main,	-95.061194	29.791834
SWG-2007-01865	Extension of time Captain Jack Roberts,	-95.065000	29.795000
SWG-2007-01837	Southwest Shipyard, L.P.-Maint Dredge,	-95.065211	29.792808
SWG-2007-01691	Kirby Inland Marine - Dredging,	-95.068400	29.791140
SWG-2007-01691	Kirby Inland Marine - Dredging,	-95.068958	29.789100
SWG-2007-01619	Sartain/UA/San Jacinto River,	-95.078232	29.798385
SWG-2007-01467	Glendale Boat Works, Inc.,	-95.066900	29.793700
SWG-2007-01398	Kirby Inland Marine-EOT for 20709(03)Dredge,	-95.090183	29.764569
SWG-2007-01383	Cemex USA-EOT 16000(08)-Houston Ship Channel,	-95.090829	29.764003
SWG-2007-01054	Steve R. Adams - Adams Boathouse,	-95.076329	29.826840
SWG-2007-01054	Steve R. Adams - Adams Boathouse Project,	-95.076329	29.826840
SWG-2007-00302	LOP - 24485 - Pat Boone -Pilings,	-95.102237	29.768063
SWG-2007-00260	LaBarge/LOP 24479/Dredge/San Jac R,	-95.090900	29.799850
SWG-2006-01614	SWG0613031; SNEED SHIPBUI,	-95.092258	29.786028
SWG-2006-01513	24318; PAUL DILL/BOATHOUS,	-95.063017	29.830714
SWG-2006-00897	24218; KIRBY INLAND MARIN,	-95.068400	29.791140
SWG-2006-00071	15299; BOONE TOWING, INC.,	-95.102956	29.769384
SWG-2005-02040	D18009; HCPHES-CDBG/JD RE,	-95.093398	29.799525
SWG-2005-01223	23911; TXDOT/CSJ 0508-01-,	-95.061059	29.792283
SWG-2005-00484	D17184; JOE HOLLINGSWORTH,	-95.068158	29.823119
SWG-2004-02418	23988; DOUGLAS FINN/ATF/R,	-95.057585	29.795369
SWG-2004-02006	23601; TH INVESTMENTS/FLE,	-95.072194	29.782510
SWG-2004-02006	23601; TH INVESTMENTS/FLE,	-95.073029	29.783381
SWG-2004-02006	23601; TH INVESTMENTS/FLE,	-95.075406	29.776315
SWG-2004-02006	23601; TH INVESTMENTS/FLE,	-95.075872	29.776328
SWG-2004-01511	D16456; A. R. PORTER/RIPR,	-95.062075	29.829692
SWG-2004-01510	D16455; PAUL H. DILL/RIPR,	-95.062008	29.829449
SWG-2004-01492	D16444; MATTHEW PORTER/BA,	-95.062520	29.830226
SWG-2004-01409	D16411; DENNIS & JILL HAW,	-95.062630	29.830504
SWG-2004-01405	23522; BALLARD/MF 103382,	-95.071111	29.789722
SWG-2004-01294	SWG0406006; PREMIER/3-D S,	-95.089515	29.779449
SWG-2004-01197	D16307; HASCO MARINE INC/,	-95.101987	29.772485
SWG-2004-00750	23418; LEROY STANLEY/BARG,	-95.072407	29.791339
SWG-2004-00651	14924; DOUGLAS FINN/FILL,	-95.057585	29.795369
SWG-2004-00165	14881; UNKNOWN/DREDGING/S,	-95.076501	29.792781
SWG-2003-02690	23812; MUSGROVE/FLEETING,	-95.069444	29.790000
SWG-2003-02234	D15516; HCPID/PIER/BULKHE,	-95.081361	29.798696
SWG-2003-01819	14811; JOE SARTAIN/SAN JA,	-95.079165	29.797557
SWG-2003-01600	23166; PAT BOONE/MOORING,	-95.101978	29.771086
SWG-2003-01202	14747; ED LOWRY/HARRIS CO,	-95.075769	29.820942
SWG-2003-01188	SWG0313012; JOHN CARNEW/R,	-95.060488	29.830501
SWG-2003-01084	23091; KIRBY/12 SPUD BARG,	-95.077778	29.776389
SWG-2003-01083	23090; KIRBY/DREDGE/SPUD,	-95.073056	29.779444
SWG-2003-01081	23089; KIRBY/12 DEADMEN/8,	-95.069444	29.790000
SWG-2003-01003	D14838; JOHN CARNEW/RIPRA,	-95.060488	29.830501
SWG-2003-00911	D14779; HCPID/RESTORE RIV,	-95.091572	29.823643
SWG-2003-00042	1583304151; CENTERPOINT E,	-95.078935	29.767887
SWG-2002-02902	2262102; WEB FLEET/2 PILE,	-95.076844	29.791829
SWG-2002-02862	2294103; T H INVESTMTS/AD,	-95.076386	29.785719
SWG-2002-02814	2294102; T H INVESTMTS/AD,	-95.078652	29.775759
SWG-2002-02787	2262101; WEB FLEET/ADD 6,	-95.076844	29.791829
SWG-2002-02555	2294101; T H INVESTMENTS/,	-95.072289	29.785630

SWG-2002-02380	22941; T H INVESTMENTS/SP,	-95.072289	29.785630
SWG-2002-01128	22744; PAT BOONE/MOORING,	-95.101978	29.771088
SWG-2002-00853	22733; KIRBY INLAND MARIN,	-95.068797	29.789338
SWG-2002-00599	SWG0213005; MALCOLM HALL,	-95.065837	29.809387
SWG-2002-00564	SWG0208002; WESTERNGECO/S,	-95.071500	29.777946
SWG-2002-00275	D13091; LARRY FOREHAND/RI,	-95.079417	29.825215
SWG-2002-00262	D13085; LLOYD DUNN/BULKHE,	-95.068302	29.813517
SWG-2002-00250	D13079; BRAD MEYER/SHOREL,	-95.080103	29.824871
SWG-2002-00218	WEB Fleet, Inc.-Permit#22621EOT-MaintDredge,	-95.075568	29.789631
SWG-2002-00218	WEB Fleet Inc. Permit 22621EOT-Maint Dredge,	-95.076295	29.790254
SWG-2002-00150	22615; SOUTHWEST SHIPYARD,	-95.067191	29.793234
SWG-2002-00146	22611; JOHN A HOLLAND/FLO,	-95.101487	29.775280
SWG-2001-00582	D12209; GOODMAN/BANK STAB,	-95.076004	29.826280
SWG-2000-02975	I5230; HOUSTON INTNL TERM,	-95.064039	29.797894
SWG-2000-01717	22196; HOGAN/RETAIN BOATH,	-95.069767	29.824871
SWG-2000-01106	SWG0013013; WILLIAMS/RIPR,	-95.063691	29.831281
SWG-2000-00943	14392041558; WILLIAMS/BOA,	-95.063691	29.831281
SWG-2000-00753	D11300; 2-D SEISMIC SURVE,	-95.102046	29.777816
SWG-2000-00616	21991; HARD'S MARINE/FLEE,	-95.101272	29.772947
SWG-2000-00499	D11176; EQUISTAR/MAINT DR,	-95.097866	29.817841
SWG-2000-00160	1928403; HOUSTON INTNL TE,	-95.064039	29.797894
SWG-2000-00064	21905; KELLAM/SAND MINE D,	-95.085001	29.811098
SWG-1999-02545	2183602; ORION CONST/EOT/,	-95.084511	29.789470
SWG-1999-02386	2183601; ORION CONSTRUCTI,	-95.084511	29.789470
SWG-1999-02386	2183601; ORION CONSTRUCTI,	-95.084511	29.789470
SWG-1999-01604	21836; MID-GULF INDUSTRIA,	-95.084511	29.789470
SWG-1999-01490	21816; PORT OF HOUSTON/DO,	-95.101752	29.771135
SWG-1999-01032	D10517; ETOCO/GEO SURVEY/,	-95.085001	29.811098
SWG-1999-00554	I3931; UNKNOWN,	-95.059444	29.796111
SWG-1999-00218	21598; HL&P/TOWER REPLACE,	-95.091302	29.765887
SWG-1998-02532	1900305; KIRBY/EOT MAINT,	-95.097786	29.779318
SWG-1998-02453	D15321; KIRBY/DREDGE/SPUD,	-95.096821	29.761821
SWG-1998-02443	1900304; KIRBY/DREDGE/SPU,	-95.097786	29.779318
SWG-1998-02421	1583303127; TRANSFER HL&P,	-95.069209	29.797813
SWG-1998-02323	1411404709; CADDLE/FIBER,	-95.061529	29.791996
SWG-1998-01943	1900303; HOLLYWOOD MARINE,	-95.097786	29.779318
SWG-1998-01114	1739401; SW SHIPYARD/DOCK,	-95.063383	29.791137
SWG-1998-01101	SWG9818007; HARRIS CNTY E,	-95.095624	29.824463
SWG-1998-00934	2070902; HOLLYWOOD MARINE,	-95.099515	29.763051
SWG-1998-00695	1583303127; HL&P/AERIAL C,	-95.069209	29.797813
SWG-1998-00388	I3692; MEGA SAND/HOUSTON,	-95.059607	29.796158
SWG-1997-02891	2115602; CHERYL K INC/REN,	-95.101771	29.772037
SWG-1997-02855	2070903; KIRBY INLAND/SPU,	-95.099515	29.763051
SWG-1997-02841	Cheryl K. Inc. 21156(01)EOT Bulkhead-Backfill,	-95.101998	29.772061
SWG-1997-02321	D906201; URS GREINER/SOLV,	-95.073532	29.806767
SWG-1997-02289	2102401000; SOUTHWEST SHI,	-95.069024	29.788794
SWG-1997-02088	2115600000; CHERYL K INC/,	-95.101771	29.772037
SWG-1997-01996	D9062; OCCIDENTAL CHEMICA,	-95.073532	29.806767
SWG-1997-01980	I3645; MEGA SAND/ALLEGED,	-95.059607	29.796158
SWG-1997-01577	D8884; HI-PORT INCORPORAT,	-95.056716	29.793858
SWG-1997-01549	2070901; HOLLYWOOD MARINE,	-95.099515	29.763051
SWG-1997-01077	2102400000; SOUTHWEST SHI,	-95.069024	29.788794
SWG-1997-01069	I3577; DOUGLAS WALDEN/ALL,	-95.065803	29.808242
SWG-1997-00788	1159008000; AMERADA HESS/,	-95.088388	29.774956
SWG-1997-00582	SWG9707004; COGEN LYONDEL,	-95.096395	29.811820
SWG-1996-02924	1555503; PELICAN REFINING,	-95.086414	29.789973
SWG-1996-02864	D15482; GLENDALE/BULKHEAD,	-95.067049	29.793336
SWG-1996-02851	20709; TRANSFER HOLLYWOOD,	-95.099515	29.763051
SWG-1996-01873	08662020000; GLENDALE BOA,	-95.067049	29.793336
SWG-1996-01808	20796; SOUTHWEST SHIPYARD,	-95.064888	29.788858
SWG-1996-01807	1900302; HOLLYWOOD MARINE,	-95.097786	29.779318

SWG-1996-01660	20709; HOLLYWOOD MARINE/D,	-95.099515	29.763051
SWG-1996-01651	SWG9607008; OUTFALL;HARRI,	-95.095211	29.804621
SWG-1996-01650	SWG9613007; RIPRAP;HARRIS,	-95.095211	29.804621
SWG-1996-01151	D7749; SOUTHWEST SHIPYARD,	-95.064888	29.788858
SWG-1996-00863	1319605000; LYONDELL-CITG,	-95.089403	29.774037
SWG-1996-00714	1378004000; MANCHESTER TE,	-95.063928	29.792482
SWG-1996-00507	1928402000; HOUSTON INTNL,	-95.064039	29.797894
SWG-1996-00422	08662010000; GLENDALE BOA,	-95.067049	29.793336
SWG-1996-00394	I3292; MR. LEROY STANLEY,	-95.101695	29.768429
SWG-1996-00204	2051700000; OLD RIVER SHI,	-95.101808	29.773841
SWG-1996-00132	10756030000; CONTINENTAL,	-95.093763	29.784795
SWG-1995-02294	1960104; MARMAC/MAINTENAN,	-95.079363	29.788631
SWG-1995-02266	1960103; MARMAC/EXTEND FL,	-95.079363	29.788631
SWG-1995-02146	1960102000; ADDITIONAL DI,	-95.079363	29.788631
SWG-1995-02084	I3217; MARK IRELAND,	-95.100887	29.779269
SWG-1995-01901	1928401; DRG SAND,MOORING*,	-95.064039	29.797894
SWG-1995-01741	D7381; OLD RIVER SHIPBUIL,	-95.101808	29.773841
SWG-1995-01674	I3217; MARK IRELAND,	-95.100887	29.779269
SWG-1995-01245	1960101000; MCDONOUGH MAR,	-95.079363	29.788631
SWG-1995-01202	D6906; ROHRHOFER/BULKHEAD,	-95.069748	29.823969
SWG-1995-01201	14392031125; ROHRHOFER/PI,	-95.069748	29.823969
SWG-1995-00869	20342; DONALD RAY/PIER RE,	-95.060495	29.826820
SWG-1995-00805	D6704; RICHEY, WILLARD W.",	-95.088875	29.798406
SWG-1995-00403	1715102; OLD RIVER SHIP T,	-95.100643	29.767544
SWG-1995-00403	1715102; OLD RIVER SHIP T,	-95.092272	29.763706
SWG-1995-00339	I3024; UNKNOWN,	-95.075907	29.796580
SWG-1995-00036	I3004; SLIM MUSGROVE,	-95.069117	29.793303
SWG-1994-01519	1900301; HOLLYWOOD MARINE,	-95.097786	29.779318
SWG-1994-01518	D6208; REBUILD WALLISVL R,	-95.095624	29.824463
SWG-1994-00171	1904701; DENNIS BLACK/ FI,	-95.095192	29.803719
SWG-1993-01434	D5377; DOLPHIN; HOUSTON S,	-95.078897	29.766083
SWG-1993-00974	1319604000; ARCO/TRANSFER,	-95.089403	29.774037
SWG-1993-00596	I2589; FILL/SAN JAC RIVER,	-95.055711	29.795317
SWG-1993-00540	19844; PIKE-PIER-SAN JAC,	-95.060476	29.825918
SWG-1993-00429	1159007; ADD DISP AREA;HO,	-95.088388	29.774956
SWG-1993-00408	D4954; BULKHEAD SAN JAC	-95.060513	29.827722
SWG-1993-00370	19782; BULKHEAD, SAN JACI",	-95.060513	29.827722
SWG-1993-00256	1319604; ARCO-HOU SHIP CH,	-95.089403	29.774037
SWG-1993-00074	1159006; ADDITION OF LOST,	-95.088388	29.774956
SWG-1992-01035	I2484; M.B. BILNOSKI/FILL,	-95.077761	29.811212
SWG-1992-00552	I2452; FRANK LAWRENCE/RIV,	-95.056557	29.796206
SWG-1992-00145	D4073; SEMINOLE PIPELINE,	-95.063611	29.794722
SWG-1992-00136	1094803; ADDITIONAL DREDG,	-95.087373	29.775874
SWG-1991-01681	1411402320; 20"PL DIR DRI",	-95.088333	29.813333
SWG-1991-01669	1411402314; DIR DRILL 10,	-95.061860	29.792514
SWG-1991-01668	1411402313; DIR DRILL/8"8",	-95.061860	29.792514
SWG-1991-01661	14392031039; JIMMY PHILLI,	-95.077482	29.797683
SWG-1991-01641	1411402302; EXXON PL CO/D,	-95.059792	29.792547
SWG-1991-01598	I2831; JIMMY PHILLIPS/BTH,	-95.077482	29.797683
SWG-1991-01554	1439202956; JIMMY PHILLIP,	-95.077482	29.797683
SWG-1991-01259	1583302112; FIB OPT CABLE,	-95.063891	29.790678
SWG-1991-00923	1378003000; MANCHESTER TE,	-95.063928	29.792482
SWG-1991-00538	1948700000; MAR-CHEM - SI,	-95.081300	29.782285
SWG-1986-00013	1319603000; ARCO/ADD DISP,	-95.089403	29.774037
SWG-0-19344	19344000000; SAND DREDGIN,	-95.090359	29.820035
SWG-0-19284	19284000000; DRG SAND,MOO,	-95.064039	29.797894
SWG-0-19047	1904700000; DENNIS BLACK,	-95.095192	29.803719

USACE MEETING NOTES
USACE, EPA, & TCEQ
INTERAGENCY MEETING ON
SAN JACINTO RIVER DIOXIN ISSUES
USACE Galveston District Room 185
15 July 2009 - 1300 to 1600hrs

Attendees:

Fred Anthamatten - USACE
Casey Cutler - USACE
Kevin Morgan - USACE
Bruce Bennett - USACE
Sam Watson - USACE
Felicity Dodson - USACE
Mark Lumen - USACE

Sharon Parrish - EPA
Carlos Sanchez - EPA
Steve Tzhone - EPA
Barbara Nann - EPA (via telecon)

Marshall Cedilote - TCEQ
Larry Koenig - TCEQ
Mark Fisher - TCEQ
Sue Reilly - TCEQ

The interagency meeting began with the introductions of meeting attendees and a respective discussion from each agency regarding each agency's roles and authorities.

Mr. Anthamatten briefed the group on the history of the Corps Regulatory issue re: San Jacinto River Waste Pit (SJWP) and the associated suspension of Permit SWG-2007-01865; Capt Jack Roberts.

Ms Parrish and Mr. Tzhone provided a brief history of EPA involvement with SJWP; status of Superfund (NPL) designation explaining that the SJWP was referred to EPA's Mediation Division and that they are in the remedial investigation stage working to identify potentially responsible parties.

TCEQ provided a brief history of their involvement with SJWP; explaining that total maximum daily load (TMDL) data collection has been conducted, and that TMDL sampling is separate from NPL data collection and sampling. They confirmed that the Capt Jack Roberts 401 Certification had been suspended and stated that they favor using a programmatic approach to solving these SJWP/Dioxin issues.

Discussion continued regarding the types of information needed and ways to exchange information between agencies. EPA & TCEQ confirmed that the perimeter polygon provided to USACE via email on April 23, 2009, and referenced in the EPA letter dated May 13, 2009, was the accurate boundary of the "area of concern" (AOC). It was also agreed upon that all references to the dioxin contamination would involve the AOC and that this area could expand or contract in the future based on a thorough sediment sampling. EPA also indicated that they would notify USACE of any future change in this boundary. EPA committed to provide personnel that will perform the necessary research of USACE permit files to acquire additional information. EPA also stated that after acquiring the necessary information, they will send notification letters to all respective

permittees/parties within the AOC. EPA stated they may issue a Unilateral Abatement Order (UAO) to a person or party that could aggravate impacts to the NPL site.

Discussions followed on regulatory solutions: permit conditions, testing protocols requirements, and the potential need for an MOU or SOP, etc. USACE emphasized that conditions must relate to items enforceable under their program and suggested EPA/TCEQ should provide direction/concurrence and verification that sediment testing results are in compliance with their requirements. Further that a DMMP must specify characteristics of satisfactory Dredge Material Placement Areas (DMPA's) – certified land fill, upland levied, upland, or beneficial use of the dredged material. TCEQ advised that historically the 300 mg/L 401 requirement was satisfactory to address the return water concerns. Agencies agreed that the responsibility for the oversight and verification of compliance with testing requirements would be EPA's. The group agreed that 3 interagency workgroups would be formed to develop solutions in 3 categories: 1) current pending permit actions, of which there are 3; 2) previously authorized permit actions within the AOC; and 3) an SOP/MOU documenting the acceptable process for all future actions. Mr. Cutler was appointed to serve as chairman for all three workgroups.

A follow-up teleconference to monitor progress was scheduled for 20 August 2009.